

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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ILUMINADA ORTEGA,

Plaintiff,

v.

CHAMPAGNE ROOM BK, INC d/b/a DRAFT
BARN d/b/a END ZONE SPORTS BAR &
LOUNGE, and RUBEN YEGHOYAN

Defendants.
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Case No.: 1:21-cv-1125 (NGG) (CLP)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT, upon the annexed memorandum of law of Jonathan Shalom, Esq., and the declaration of Jonathan Shalom, Esq., and all prior papers and proceedings in this case, the Plaintiff, by his undersigned counsel, will move this Court, on such date as is set by the Court, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, granting Plaintiff Iluminada Ortega (“Plaintiff” or “Ortega”) leave to amend her pleadings.

PLEASE TAKE FURTHER NOTICE THAT, pursuant to this Court’s Order dated August 19, 2022, answering papers, if any, shall be served on the undersigned no later than September 30, 2022, and Plaintiff shall file reply papers in further support no later than October 7, 2022.

Dated: Forest Hills, New York
September 9, 2022

SHALOM LAW, PLLC

By: /s/ Jonathan Shalom, Esq.

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